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04/11/03 03:18 PM

To: Gwen DiPietro/DC/USEPA/US@EPA  
cc:  
Subject: RE: Onsite Management Unit Summary

Gwen,

Here is a marked up version of the onsite units list showing our corrections. Please note that many of our the revisions to the comment section are intended to clarify the timeline. As currently drafted, the comments could imply (particularly to someone not familiar with the rulemaking history) that there is inconsistent information about some of the sites, when in fact, the situation is that circumstances have changed since our 1995 comments.

Let me know if any questions, please.

Thanks, Tucker

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-----Original Message-----

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Subject: Onsite Management Unit Summary

Larry, Tucker and John,

I am sending you our most recent summary of information on onsite management units for facilities manufacturing dyes or pigments.

If you have any comments or questions, it would be great if you could get back to me by the end of next week.

Thank you again for your help in compiling this summary.

Gwen

(See attached file: Onsiteunits\_D&P\_updated.wpd)(See attached file: Onsiteunits\_D&P\_updated.doc)

Gwen DiPietro  
703-308-8285

## Summary of Information on Onsite Management Units for Facilities Manufacturing Dyes and/or Pigments\*

Facility	Product Line	Information Available Regarding Onsite Waste Management Units
Apollo Colors Rockdale, IL	Pigments	TRI report in 1999 showed release to onsite landfill (no 2000 land releases). CPMA indicated that Apollo made a mistake in entering data and that this facility does not have an onsite landfill.
BASF Corp. Rensselaer, NY	Formerly Dyes and Pigments; now closed	Comments <u>submitted in 1995</u> indicated two surface impoundments with clay liners. It appears that the plant closed in 2000 (SRI). ETAD <del>confirmed</del> <u>confirms</u> that the site closed.
<u>Blackman Uhler/Synalloy</u>		
Spartanburg, SC	Dyes and Pigments	Comments <u>submitted in 1995</u> indicated <u>d</u> double lined impoundment with leachate collection system. ETAD <del>indicated-reports</del> that this facility <u>now</u> makes <u>only</u> a limited number of azo dyes in low volume. CPMA confirmed the facility manufactures pigments.
Augusta, GA	Formerly Dyes; now closed	Comments <u>submitted in 1995</u> indicated <u>d</u> impoundment; no mention of liner. ETAD <del>reports</del> <u>indicated</u> that this facility is now closed.
CDR Pigments & Dispersions (Flint Ink Inc.)		
Elizabethtown, KY Cincinnati, OH Ridgway, PA	Pigments	Comments from CDR indicate onsite surface impoundment may exist. (“...CDR pretreats in an enclosed tank system or surface impoundment with liner”), and that CDR planned to eliminate even lined impoundments voluntarily. CPMA confirmed that the only impoundment was at the Ridgeway facility, and that this site is now closed.
Former Crompton & Knowles Facilities		
(Now owned by Sensient Colors, Inc.) Gibraltar, PA	Dyes; plant closure announced	Comments <u>submitted in 1995</u> indicated <u>d</u> existing and proposed impoundments have/would have double liner system. TRI report for 2000 shows releases to surface impoundments. State confirmed multiple impoundments onsite. Information provided by ETAD indicates: there are currently three active surface impoundments with double synthetic liners and leak detection systems (clay-lined impoundments have been closed). Sensient Colors has announced the impending closure of this facility (mid 2003); ETAD <del>confirmed</del> <u>also reports that</u> the facility is closing.

(Now owned by Sensient Colors Inc.) [NOTE: Facility was closed by Crompton and was not acquired by Sensient] Nutley, NJ	Formerly Dyes; now closed	Comments <u>submitted in 1995 stated</u> <del>suggested</del> facilities other than Gibraltar used tanks. <del>ETAD-ETAD reports</del> <u>indicated</u> that this facility closed in 2000.
(Now owned by Yorkshire Americas) Lowell, NC	Dyes	Comments <u>submitted in 1995 stated</u> <del>suggested</del> facilities other than Gibraltar used tanks; TRI shows releases to surface impoundments as late as 1993. ETAD confirmed <del>sed there currently are now no</del> that former onsite surface impoundments <u>were closed pre-1995 and that current;</u> onsite wastewater treatment occurs in tanks.
Clariant Corp.		
(formerly Hoechst-Celanese) Coventry, RI	Pigments; former Dyes portion closed	Comments <u>submitted in 1995</u> indicated the wastewater treatment system included a surface impoundment (aeration basin) that was “steel-reinforced concrete lined.” ETAD <del>indicated reports</del> that this facility no longer manufactures dyes. CPMA confirmed the facility continues to manufacture pigments.
(formerly Sandoz Chemical) Charlotte, NC	<del>Dyes; however, no in-scope products</del> <u>Formerly dyes;</u>	Comments <u>submitted in 1995</u> did not mention any onsite landfill or impoundment in use. TRI report for 2000 indicates release to onsite landfill. ETAD comments in 1995 said facility made azo dyes, but Clariant comments said “no longer manufactures azo dyes . . . no longer manufactures . . . any pigments.” ETAD <del>confirms</del> <u>has confirmed</u> that this facility no longer manufactures dyes <del>in any of the relevant classes (azo, anthraquinone, or triarylmethane).</del>
(formerly Sandoz Chemical) Martin, SC	Dyes	Comments <u>submitted in 1995</u> indicated onsite surface impoundment was closed and replaced with tanks. This is consistent with TRI, which reported releases to an impoundment in 1992 through 1995, but nothing in 2000. ETAD confirmed <del>sed</del> that onsite surface impoundment was closed and replaced with tanks.
Eastman Chemical Kingsport, TN	Dyes	TRI data for 2000 indicates onsite Subtitle D and C landfills exist. ETAD <del>indicated reports</del> that dye manufacturing is now reduced to limited quantities for internal use only. Eastman also reported to ETAD that all relevant wastes are incinerated in units that burn hazardous and nonhazardous wastes.
Bayer Corp. (Miles, Inc.) Bushy Park Plant Charleston, SC	Dyes and Pigments	Comments <u>submitted in 1995</u> indicated: onsite surface impoundment (polishing pond), with no liner specified, scheduled to close in 1996; onsite landfill undergoing closure. TRI for 2000 reported “other onsite disposal” (40 lbs.); TRI from prior years reported releases to impoundments. ETAD confirmed <del>sed</del> that onsite impoundments have been closed and replaced with tanks; TRI report of other onsite disposal refers to a spill incident.

March 20, 2003

Milliken and Company		
Dewey Plant Inman, SC	Polymeric colorants	Comments <u>submitted in 1995</u> indicated active basins onsite lined with native clay <u>but that</u> . <del>Milliken comments indicated</del> this facility only manufactures polymeric colorants, which are not subject to the proposed rule. ETAD <del>also indicated</del> <u>confirms that the processes</u> <del>products</del> are not subject to the proposed listing.
Cypress Plant Blacksburg, SC	Polymeric colorants	Comments <u>submitted in 1995</u> indicated active basins onsite lined with native clay <u>but that</u> . <del>Milliken comments indicated</del> this facility only manufactures polymeric colorants, which are not subject to the proposed rule. ETAD <del>also indicated products</del> <u>confirms that the processes</u> are not subject to the proposed listing.

\* The table includes information provided in public comments on the proposed listings in 1994 and 1999, information from reports filed for the Toxics Release Inventory (TRI), and information provided by ETAD and CPMA in meetings on December 5, 2002 and in follow-up submissions.